

REMARKS

This paper is responsive in any other manner indicated below.

CONCURRENT REQUEST FOR CONTINUED EXAMINATION (RCE)

Submitted concurrently herewith is RCE transmittal, but if omitted, then this paper should be taken as a request for the filing of an RCE.

RCE FILED TO AVOID PROSECUTION DELAYS

In view of the significant features/limitations of the amended and/or added claims being inappropriate (i.e., deniable) for entry after final rejection in that such would require significant further search and/or consideration, the present RCE was filed to avoid Advisory Action delay and to gain immediate entry/consideration of such feature/limitations. In view of the significant features/limitations of the amended and/or added claims, it is respectfully submitted that it would NOT BE PROPER to make a FIRST ACTION FINAL within the present RCE.

PENDING CLAIMS

Claims 1, 2 and 5-10 were pending, under consideration and subjected to examination in the Office Action. Appropriate claims have been amended, canceled and/or added (without prejudice or disclaimer) in order to adjust a clarity and/or focus of Applicant's claimed invention. That is, such changes are unrelated to any prior art or scope adjustment and are simply refocused claims in which Applicant is present interested. At entry of this paper, Claims 1, 2 and 5-13 will be pending for further consideration and examination in the application.

REJECTION UNDER 35 USC '103

The 35 USC '103 rejection of claims 1, 2 and 5-10 as being unpatentable over Matsumoto et al. (U.S. Patent 5,796,428) in view of Miike et al. (U.S. Patent 5,787,414) is respectfully traversed. However, such rejections have been rendered obsolete by the present clarifying amendments to Applicant's claims, and accordingly, traversal arguments are not appropriate at this time. However, Applicant respectfully submits the following to preclude renewal of any such rejections against Applicant's clarified claims.

All descriptions of Applicant's invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated hereat by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following.

Applicant's disclosed and claimed invention is directed to an improved arrangement which can be used to manage a large number of separately-stored still image files (or documents) arranged into a group (i.e., collection), while at the same time, allowing fast searches with respect to the group, and only requiring a small amount of memory resources to store group management information. More particularly, in the art, when a digital camera takes still pictures, individual still pictures are stored within separate computer files. Applicant's invention may be used to divide a plurality of separately-stored still image files into different groups, e.g., by forming a new group for every 64 still pictures. If a search for a picture based upon a picture's origination (i.e., production) time is performed with respect to

the group, and if the search was required to compare against a start-time and/or end-time for each picture, searching may be onerous, i.e., take a long processing time to perform the comparison with each picture's data, and a large memory would be required to store the start-time and/or end-time for each picture.

In order to allow quicker searching with respect to a group, and in order to afford the opportunity to reduce an amount of memory required for management information, Applicant's disclosed and claimed invention includes an arrangement where "still picture group management information includes time information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device". Such "still picture group management information" is "provided SEPARATELY FROM any still picture management information containing management information for each still picture". That is,

if still picture management information

containing management information is provided

(see **VOB map 6** in Applicant's **FIG. 1**,

reproduced herewith for convenience),

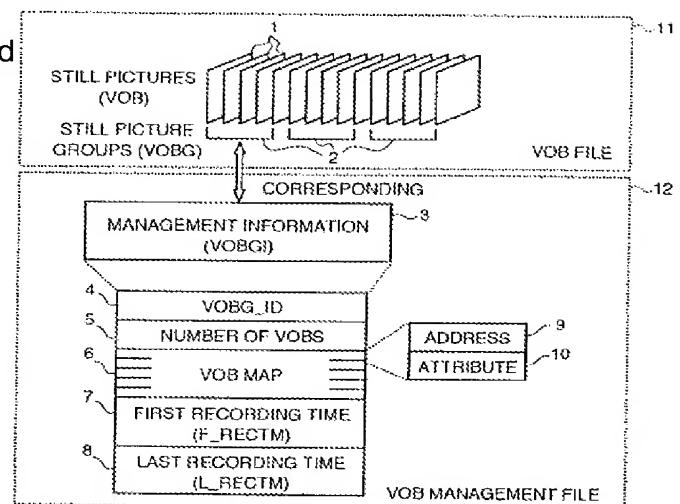
Applicant's "still picture group management

information" 7, 8 is provided SEPARATE

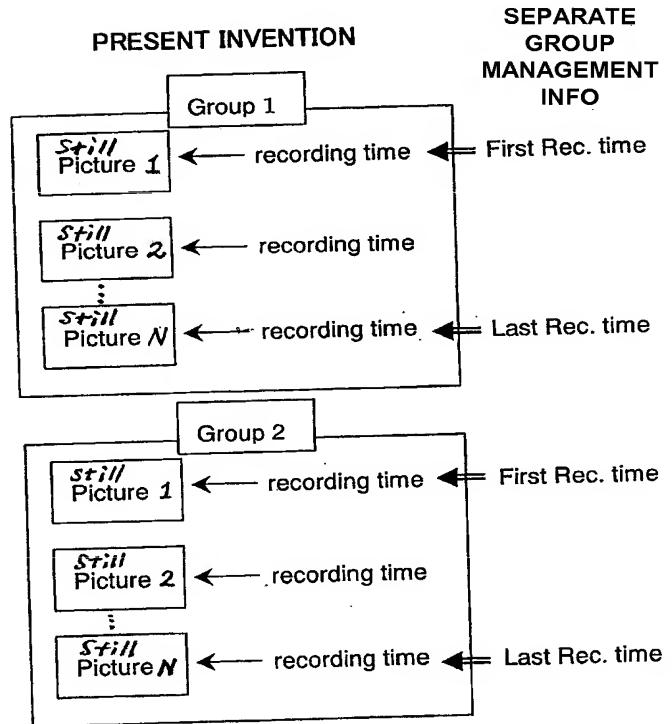
FROM the still picture management

information.

FIG. 1



If two groups of still pictures were to be formed, a representation of such groups via Applicant's invention might be shown by the following sketch. Again, Applicant's invention can reduce an amount of memory required for group management information if the "first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest- photographed still picture in said still picture group was recorded last by the picture-taking device" is included, but the recording time for each individual picture is excluded.



In terms of distinguishing features/limitations, Applicant's independent claim 1 (taken as an example), recites: "A method for recording still picture data of N still pictures stored in separate N files, respectively, and for recording still picture group management information for managing N still picture data of said N still pictures as a still picture group, onto a storage medium, where N is an integer number equal to or larger than one, wherein said still picture group management information is provided SEPARATELY FROM any still picture management information containing management information for each still picture, and said still picture group management information includes time

information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device, said method comprising: comparing a recording time of said still picture data of a still picture, with said first recording time stored in said still picture group management information corresponding to the still picture group belonging to said still picture data; and if said recording time is earlier than said first recording time, replacing the content of said first recording time by said recording time and performing recording thereof.” Applicant’s independent claim 5 have similar or analogous features/limitations. Applicant’s independent claim 7 is broader and contains important ones of such features/limitations.

Turning now to rebuttal of the Matsumoto et al. reference, it is respectfully submitted that Matsumoto et al. does disclose arrangements for grouping image data into “album groups”, “page lists”, “picture lists”, etc. However, Office Action comments (e.g., page 4, lines 8-10) ADMIT that Matsumoto is deficient in that it fails to disclose the still picture group management information only storing the earliest and last recording times and updating either one of those if it needs [to be] updated.” [Sentence clarification added.] Applicant respectfully agrees with such admission. More particularly, nowhere does Matsumoto et al.’s “album groups”, “page lists” or “picture lists” include Applicant’s claimed limitations, “wherein said still picture group management information is

provided SEPARATELY FROM any still picture management information
containing management information for each still picture, and said still picture group management information includes time information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device". In fact, Matsumoto's "album groups", "page lists" and "picture lists" appear NOT to contain any type of group management info provided separate from picture management info and having only a recording start/time time which are attributed to first/last pictures.

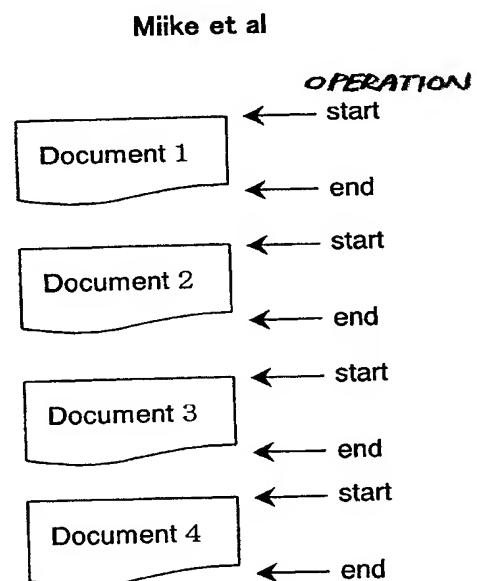
In an attempt to cure the major deficiency of Matsumoto, the Office Action rejection further cites Miike et al. However, as explained in detail within Applicant's prior 03 July 2008 Amendment, Miike et al.'s disclosure only teaches production/edit times with respect to a "document" (e.g., word-processing document, spreadsheet document"), and such production/edit times pertain to the creation and completion times of the document (not the recording times of pictures). Such explanation is repeated and supplemented herein as follows.

More particularly, Miike et al. does teach (column 47, lines 33-40, for example) saving a "production start time" and a "production end time" with respect to a produced "document". However, a thorough understanding of the Miike et al. disclosure reveals that such teachings do not disclose or suggest Applicant's claimed arrangement.

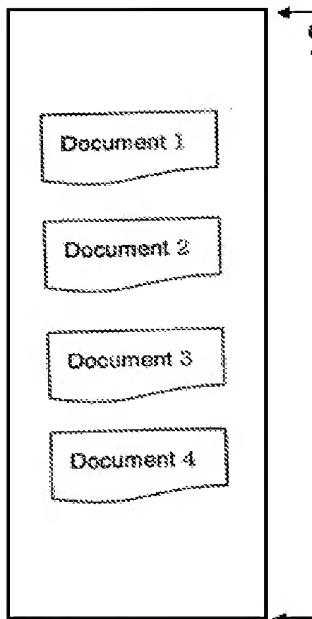
More particularly, it is respectfully submitted that Miike et al.'s "document" is the same as a computer "file", i.e., they are analogous. So when Miike et al. speaks of "production start time" and a "production end time" with respect to a produced "document", Miike et al. disclosure means that the time when production of that particular document (or computer file) is started, and the time when production of that particular document (or computer file) is completed, are saved with respect to that document.

If one were to take four separate still pictures (as documents) at 1:00am, 2:00am, 3:00am and 4:00am, then still picture files as examples of Miike et al.'s disclosed "document" arrangement, would be represented by the following sketch. That is, each separate still picture would have its own "document" or computer file, and each separate still picture "document" would then have Miike et al.'s start time and end time

associated therewith. More specifically, picture 1 as "Document 1" would have a 1:00am start time and 1:00am end time under the Miike et al. scheme, picture 2 as "Document 2" would have a 2:00am start time and 2:00am end time, picture 3 as "Document 3" would have a 3:00am start time and 3:00am end time, and picture 4 as "Document 4" would have a 4:00am start time and 4:00am end time.



As differing example, if a user were then to start work



at 6:00pm on a word processing “document” (or a PowerPoint slide show “document”) then incorporating the four pictures therein, and then complete the “document” at 9:00pm, then the 6:00pm “production start time” and 9:00pm “production end time” of the word processing are saved (using the Miike et al.’s scheme) with respect to that word processing (or PowerPoint) document (i.e., computer file). Such may be pictured as shown. The 1:00am “start” time of the earliest picture 1 or document 1, and 4:00am “end” time of the latest picture 4 or document 4 (incorporated as still pictures into the word processing document) would not be associated with the word processing (or PowerPoint) “document”. In short, Miike et al.’s “document” does not adopt the start/end times of the still pictures.

Accordingly, if the teachings of Miike et al.’s disclosure were to be applied to Matsumoto et al.’s “album groups”, “page lists” and “picture lists”, at best, there would result an “album group”, “page list” and “picture list” having a start time and end time associated therewith which are related to when such “album group”, “page list” and “picture list” was first worked on, and then completed. That is, the start time and end time would NOT take on the 1:00am “start” time of the earliest picture 1, or 4:00am “end” time of the latest picture 4.

Finally, in closing the Undersigned's comments, with respect to any allegation that a video clip is just a collection or group of still pictures, it is respectfully noted that a video clip is stored within a singular video computer file, i.e., a video clip would not meet Applicant's claimed feature/limitations of "still picture data of N still pictures stored in separate N files, respectively".

In addition to the foregoing, the following additional remarks from Applicant's foreign representative are also submitted in support of traversal of the rejection and patentability of Applicant's claims.

Applicant's still picture group management information includes the first recording time and the last recording time of each of the still picture group. Any other kind of information is included in the time information of the still picture management information. Miike et al and Matsumoto et al do not disclose still picture group management information which manages the information of the still pictures not as each individual picture but as each group of still pictures. The data information disclosed in Miike and Matsumoto include various kinds of information for each individual picture other than the time information of shot time of the still pictures. Matsumoto shows, in Figs. 12 and 14. a list of data for still pictures, wherein the list includes recording times of the still pictures which are neither first recording time nor the last recording time. The data information table disclosed in Miike and Matsumoto require more storage capacity than that of the present invention.

As a result of all of the foregoing, it is respectfully submitted that the applied art (taken alone and in the Office Action combinations) would not support a '103 obviousness-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such '103 rejection, and express written allowance of all of the '103 rejected claims, are respectfully requested.

EXAMINER INVITED TO TELEPHONE

The Examiner is herein invited to telephone the undersigned attorneys at the local Washington, D.C. area telephone number of 703/312-6600 for discussing any Examiner's Amendments or other suggested actions for accelerating prosecution and moving the present application to allowance.

RESERVATION OF RIGHTS

It is respectfully submitted that any and all claim amendments and/or cancellations submitted within this paper and throughout prosecution of the present application are without prejudice or disclaimer. That is, any above statements, or any present amendment or cancellation of claims (all made without prejudice or disclaimer), should not be taken as an indication or admission that any objection/rejection was valid, or as a disclaimer of any scope or subject matter. Applicant respectfully reserves all rights to file subsequent related application(s) (including reissue applications) directed to any/all previously claimed limitations/features which have been subsequently amended or cancelled, or to any/all limitations/features not yet claimed, i.e., Applicant continues (indefinitely) to maintain no intention or desire to dedicate or surrender any limitations/features of subject matter of the present application to the public.

CONCLUSION

This Amendment is being submitted concurrently with the filing of a Request for Continued Examination (RCE) and does not present any changes which would require further search, consideration or fees. Entry and approval of the minor corrections made herein are respectfully requested.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR '1.136. Authorization is herein given to charge any shortage in the fees, including extension of time fees and excess claim fees, to Deposit Account No. 01-2135 (Case No. 500.37453CX3) and please credit any excess fees to such deposit account.

Based upon all of the foregoing, allowance of all presently-pending claims is respectfully requested.

Respectfully submitted,

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